

AO 187 (Rev. 7/87) Exhibit and Witness List

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

GEORGIA, ATLANTA DIVISION

J.G.

Defendant's
EXHIBIT AND WITNESS LIST

V.

NORTHBROOK INDUSTRIES, INC.

Case Number: 1:20-cv-05233-SEG

PRESIDING JUDGE Hon. Sarah E. Geraghty					PLAINTIFF'S ATTORNEY David Bouchard	DEFENDANT'S ATTORNEY Dana Richens
TRIAL DATE (S) 7/7/25 - 7/11/25					COURT REPORTER	COURTROOM DEPUTY Stephanie Pittman
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
	1				Location of United Inn	
	2				United Inn layout (NBI000620)	
	3				Aerial view of United Inn	
	4	7/10/25	✓	✓	United Inn Rules of Conduct (NBI000581)	
	5	7/10/25	✓	✓	United Inn Rules and Regulations (NBI002718)	
	6				Registration form (NBI000584)	
	7	7/10/25	✓	✓	United Inn Management Policies (NBI000559 - NBI000570)	
	8	7/9/25	✓	✓	Criminal trespass warning (blank) (NBI000325)	
	9				Employee list (NBI004147)	
	10				Employee list (NBI000624)	
	11				Front desk schedules (NBI000073)	
	12				Housekeeping schedules (NBI000621)	
	13				Payroll information – August 2018 (NBI002403)	
	14				Payroll information – November 2018 (NBI002338)	
	15				Atlanta Center for Self- Sufficiency correspondence (NBI002937)	
	16				Salvation Army correspondence (NBI003104-003105; NBI003133-003134; NBI003357-003360)	
	17				St. Vincent de Paul correspondence (NBI002915-002918)	
	18				DeKalb County DFCS correspondence (NBI003697-003701; NBI003922-003924)	
	19				United Way of Greater Atlanta correspondence (NBI003195-003199)	
	20				Atlanta Cancer Care Foundation correspondence (NBI003195-003199)	
	21				Women's Resource Center to End Domestic Violence correspondence	
	22				Decatur Cooperative Ministry correspondence (NBI002960-002962)	

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	23				Decatur Presbyterian Church correspondence (NBI003230-003233; NBI003813-003814)	
	24				Wheat Street Baptist Church correspondence (NBI-3189-003191)	
	25				Georgia Cancer Center for Excellence correspondence (NBI002912002914)	
	26				Berea Mennonite Church correspondence (NBI003399-003402)	
	27				Buckhead Christian Ministry correspondence (NBI003345-003347; NBI003925-003928)	
	28				American Lung Association correspondence (NBI003003-003005; NBI003092-003094)	
	29				Photo of interior of United Inn (NBI004133)	
	30				Photo of interior of United Inn (NBI004134)	
	31				Photo of interior of United Inn (NBI004135)	
	32				Photo of interior of United Inn (NBI004136)	
	33				Photo of interior of United Inn (NBI004137)	
	34				Photo of interior of United Inn (NBI004138)	
	35				Photo of interior of United Inn (NBI004139)	
	36				Photo of interior of United Inn (NBI004140)	
	37				Photo of interior of United Inn (NBI004141)	
	38				Photo of interior of United Inn (NBI004142)	
	39	7/10/25	✓	✓	Photo of interior of United Inn (NBI004143)	
	40				Photo of interior of United Inn (NBI004144)	
	41				Photo of interior of United Inn (NBI004145)	
	42				Photo of interior of United Inn (NBI004146)	
	43				Photo of interior of United Inn (NBI004149)	
	44				Photo of lobby from office (produced 9.6.23)	

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
	45				Photo of lobby from office (produced 9.6.23)	
	46				Night window and camera (produced 9.6.23)	
	47				Night window and camera (produced 9.6.23)	
	48				Night window and camera (produced 9.6.23)	
	49				Office from lobby (produced 9.6.23)	
	50				Office from lobby (produced 9.6.23)	
	51				Email thread re: Discover DeKalb meeting (NBI002709-002710)	
	52				Email thread re: Discover DeKalb meeting (NBI002682-002683)	
	53				DeKalb County ordinance (NBI002684-002697)	
	54				Anti-trafficking literature (NBI000625-000631)	
	55				WITHDRAWN	
	56				Tourist Accommodation Inspection Report (NBI002982)	
	57				Email thread with DeKalb Co. (NBI002494-2495)	
	58				DeKalb Co. State Court Receipt (NBI002286)	
	59				Check to DeKalb County (NBI 002451.0001)	
	60				Text messages with Detective Weber (NBI004060-004081)	
	61				Text messages with Detective Weber (NBI004105-004110)	
	62				Text messages with Detective Weber (NBI004103-004104)	
	63				Email thread with Agent Strickler (NBI002554-002555)	
	64				J.G. DFCS Universal Application (PLAINTIFF-JG-000071(UI&S) - PLAINTIFF-JG-000078(UI&S))	
	65				J.G. screenshot (PLAINTIFF-JG-000069 (UI&S))	
	66				J.G. screenshot (PLAINTIFF-JG-001716 (UI&S))	

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
	67				J.G. text thread (PLAINTIFF-JG-001718 (UI&S))	
	68				J.G. photo (PLAINTIFF-JG-001720 (UI&S))	
	69				J.G. photo (PLAINTIFF-JG-001721 (UI&S))	
	70				J.G. photo (PLAINTIFF-JG-001722 (UI&S))	
	71				Missing/runaway juvenile bulletin (N. Williams) (NBI004153)	
	72				Missing person notice (Ashanti Walker) (NBI004150-004152)	
	73	7/9/25	✓	✓	Email from Investigator Wade (NBI003099)	
	74				Investigator Wade (NBI003106)	
	75				J.G. BOLO (NBI003107)	
	76				Email from Investigator Wade with J.G. BOLO (NBI003097-003098)	
	77				11.14.18 incident report (PLAINTIFF-002718- 002725 (UI&S))	
	78				Police body-cam footage of 11.14.2018 incident (NBI000710) *	
	79				Police body-cam footage of 11.14.2018 incident (NBI000711) *	
	80				Police body-cam footage of 11.14.2018 incident (NBI000712) *	
	81				Police body-cam footage of 11.14.2018 incident (NBI000713) *	
	82				Police body-cam footage of 11.14.2018 incident (NBI000714) *	
	83				Police body-cam footage of 11.14.2018 incident (NBI000715) *	
	84				Police body-cam footage of 11.14.2018 incident (NBI000716) *	
	85				Police body-cam footage of 11.14.2018 incident (NBI000717) *	
	86				Police body-cam footage of 11.14.2018 incident (NBI000718) *	
	87				Police body-cam footage of 11.14.2018 incident (NBI000719) *	
	88				Police body-cam footage of 11.14.2018 incident (NBI000720) *	

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
	89				Police body-cam footage of 11.14.2018 incident (NBI000721) *	
	90				Partial clip of police bodycam footage (42:40 - 45:20) *	
	91	7/9/25	✓	✓	Still image from police bodycam footage at 42:43	
	92	7/10/25	✓	✓	Still image from police bodycam footage at 1:11:45	
	93	7/9/25	✓	✓	Partial clip of police bodycam footage (5:23 - 6:10) *	
	94	7/10/25	✓	✓	Still image from police bodycam footage at 1:40	
	95	7/9/25	✓	✓	Partial clip of bodycam footage (5:05 - 9:30) *	
	96				Still image from police bodycam footage at 2:11	
	97	7/9/25	✓	✓	Partial clip of police bodycam footage (3:24 - 4:30) *	
	98	7/10/25	✓	✓	Still image from police bodycam footage at 48:39	
	99				Criminal trespass warning (Victoria Thomas) (NBI000181)	
	100				Criminal trespass warning (Chimeko G.) (NBI000182)	
	101				Criminal trespass warning (Raevyn Rustenmeyer) (NBI00178)	
	102				Criminal trespass warning (Quinton Bush) (NBI000'22)	
	103				Naliesha-ann Satele photo (PLAINTIFF-038862(UI&S))	
	104				Naliesha-ann Satele photo with J.G. (PLAINTIFF-038863(UI&S))	
	105				Naliesha-ann Satele video, January 6, 2019 (PLAINTIFF-038860(UI&S)) *	
	106				Naliesha-ann Satele video (PLAINTIFF-038861(UI&S)) *	
	107				Naliesha-ann Satele social media (NBI004154-004163)	
	108				WITHDRAWN	
	109				WITHDRAWN	
	110				WITHDRAWN	

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	111				WITHDRAWN	
	112				WITHDRAWN	
	113				WITHDRAWN	
	114				WITHDRAWN	
	115				WITHDRAWN	
	116				J.G. audited history (PLAINTIFF-JG-000063(UI&S))	
	117				WITHDRAWN	
	118				WITHDRAWN	
	119				WITHDRAWN	
	120				WITHDRAWN	
	121				WITHDRAWN	
	122				A.G. v. Northbrook Industries Order on Summary Judgment (20-cv-05231, Doc151)	
	123				A.G. v. Northbrook Industries Clerk's Entry of Judgment (20-cv-05231, Doc152)	
	124				G.W. v. Northbrook Industries Order on Summary Judgment (20-cv-05232, Doc148)	
	125				G.W. v. Northbrook Industries Clerk's Entry of Judgment (20-cv-05232, Doc149)	
	126				Vellani expert report	
	127				Polaris Comprehensive Human Trafficking Assessment	
	128				Chaneyfield engagement letter	
	129				Chaneyfield expert report	
	130				IHG hotel brands	
	131				IHG sex trafficking lawsuits	
	132				IHG job posting	

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	133				GHLA training notice	
	134				IAPSC Forensic Methodology	
	135				IAPSC Forensic Methodology (revised)	
	136				McDowell engagement letters	
	137				McDowell resume	
	138				McDowell expert report	
	139				CSE-IT form	
	140				CSE-IT validation report	
	141				CSE-IT form (J.G.)	
	142				Trafficking placard	
	143				Plaintiff's Initial Disclosures	
	144				Plaintiff's Responses to Defendant's First Continuing Interrogatories	
	145				Plaintiff's Responses to Defendant's First Request for Production of Documents	
	146				Plaintiff's Responses to Defendant's Second Continuing Interrogatories	
	147				Plaintiff's Responses to Defendant's Second Request for Production of Documents	
	148				Defendant's Initial Disclosures	
	149				Defendant's Responses to 1st RPDs	
	150				Defendant's Responses to 1st ROGs	
	151				Defendant's Responses to 1st RFAs	
	152				Defendant's Supplement to Initial Disclosures	
	153				Defendant's Responses to 1st Supplemental RPDs	
	154				Defendant's Responses to 1st Supplemental ROGs	

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